# State of Utah DEPARTMENT OF NATURAL RESOURCES DIVISION OF OIL, GAS AND MINING

INSPECTION REPORT

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Michael O. Leavitt Governor Ted Stewart Executive Director

James W. Carter

355 West North Temple 3 Triad Center, Suite 350 Salt Lake City, Utah 84180-1203 801-538-5340 801-359-3940 (Fax)

Partial: Complete: X Exploration: Inspection Date & Time: 3/8/95 8:10am-5:30pm

Date of Last Inspection: 2/23/95

Division Director ■ 801-538-5319 (TDD)
Mine Name: <u>Crandall Canyon Mine</u> County: <u>Emery</u> Permit Number: <u>ACT/015/032</u>
Permittee and/or Operator's Name: Genwal Coal Company
Business Address: P. O. Box 1201, Huntington, Utah 84528
Type of Mining Activity: Underground XXX Surface Prep. Plant Other
Company Official(s): Randy Gainer
State Officials(s): Peter Hess Federal Official(s): Tom Wright
Weather Conditions: Partly Cloudy/40's
Existing Acreage: Permitted-2165.42 Disturbed-5.55 Regraded-5 Seeded-5 Bonded-5.5
Increased/Decreased: Permitted Disturbed Regraded Seeded Bonded
Status:Exploration/_XXX_Active/Inactive/Temporary Cessation/Bond Forfeiture
Reclamation (Phase I/Phase II/Final Bond Release/LiabilityYear)

#### REVIEW OF PERMIT, PERFORMANCE STANDARDS & PERMIT CONDITION REQUIREMENTS

#### **Instructions**

- 1. Substantiate the elements on this inspection by checking the appropriate performance standard.
  - a. For <u>complete inspections</u> provide narrative justification for any elements not fully inspected unless element is not appropriate to the site, in which case check N/A.
  - b. For partial inspections check only the elements evaluated.
- 2. Document any noncompliance situation by referencing the NOV issued at the appropriate performance standard listed below.
- 3. Reference any narratives written in conjunction with this inspection at the appropriate performance standard listed below.
- 4. Provide a brief status report for all pending enforcement actions, permit conditions, Division Orders, and amendments.

<ol> <li>PERMITS, CHANGE, TRANSFER, RENEWAL, SALE</li> <li>SIGNS AND MARKERS</li> <li>TOPSOIL</li> </ol>	EVALUATED [X] [X] [X]	<u>N/A</u> [_] [_] [_]	COMMENTS [X] [X] [X]	NOV/ENF
<ul> <li>4. HYDROLOGIC BALANCE:</li> <li>a. DIVERSIONS</li> <li>b. SEDIMENT PONDS AND IMPOUNDMENTS</li> <li>c. OTHER SEDIMENT CONTROL MEASURES</li> <li>d. WATER MONITORING</li> <li>e. EFFLUENT LIMITATIONS</li> <li>5. EXPLOSIVES</li> <li>6. DISPOSAL OF EXCESS SPOIL/FILLS/BENCHES</li> <li>7. COAL MINE WASTE/REFUSE PILES/IMPOUNDMENTS</li> <li>8. NONCOAL WASTE</li> </ul>	[X] [X] [X] [X] [X] [X] [X] [L]		[X] [X] [X] [] [] [X] [] [X]	[X] [X] *TDN 3/16/9 [] [] [] [] [] [] []
9. PROTECTION OF FISH, WILDLIFE AND RELATED ENVIRONMENTAL VALUES 10. SLIDES AND OTHER DAMAGE 11. CONTEMPORANEOUS RECLAMATION 12. BACKFILLING AND GRADING 13. REVEGETATION 14. SUBSIDENCE CONTROL 15. CESSATION OF OPERATIONS 16. ROADS:				
a. CONSTRUCTION/MAINTENANCE/SURFACING b. DRAINAGE CONTROLS  17. OTHER TRANSPORTATION FACILITIES  18. SUPPORT FACILITIES/UTILITY INSTALLATIONS  19. AVS CHECK (4th Quarter-April, May, June) (dat  20. AIR QUALITY PERMIT  21. BONDING & INSURANCE	[X] [X] [_] [X] e) [X] [X]			



#### **INSPECTION REPORT**

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PERMIT NUMBER: <u>ACT/015/032</u>

DATE OF INSPECTION: 2/23/95

# (Comments are Numbered to Correspond with Topics Listed Above)

# 1. PERMITS, CHANGE, TRANSFER, RENEWAL, SALE

A portion of the ownership of Genwal Coal Company (that portion formerly owned by Nevada Electric Investment Company) has changed hands.

The mine is now part of Genwal Resources, Inc. and the portion which was previously held by NEICO is now owned by Andalex Resources, Inc. The effective date of the sale was January 1, 1995.

The permittee submitted an amendment for a change of legal identity on March 7, 1995 to the DOGM.

The permit transfer application was submitted January 27, 1995 and is referred to as amendment 95-A.

#### 2. SIGNS AND MARKERS

Based on the review of the disturbed area boundary map, several disturbed area markers were missing in the area of the pond 001 culvert where it discharges into Crandall Creek. It was felt that the lack of these markers did not create a significant problem. The permittee was instructed to install them as quickly as possible.

Also, the delineation of the disturbed area around the undisturbed diversion UD-3 was very difficult to ascertain, particularly in the area where the pipe discharges into the drainage. It was first thought that there were no markers in this area; closer inspection by permittee personnel verified that the markers were there, but were not distinguishable in the thick vegetation. The markers were repainted to bring the area into compliance during the inspection.

The first topsoil pile down canyon from the mine site needed to have the disturbed area markers repainted.

It was noted during the field inspection that there was a lack of stream buffer zone signs in the area adjacent to the 001 mine water/sediment pond. The signs were adequate further upstream; the permittee agreed to install additional signs in this area.

Mr. Tom Wright, OSM Inspector, raised the question of what the actual acreage of disturbance is within the permit, as the numbers seem to vary. According to Mr. Randy Gainer, Environmental Manager, the MRP indicates 5.41 acres as the correct acreage. Sediment pond 001 is sized to accommodate 6.85 acres.

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PERMIT NUMBER: ACT/015/032

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Mr. Wright suggested during the course of the field inspection that the three topsoil piles which are located along the Crandall Canyon road (Special Use Permit, U. S. Forest Service) be marked with permittee identification signs indicating that they are the property of Genwal Coal Company/Genwal Resources.

#### 4a. HYDROLOGIC BALANCE: DIVERSIONS

During the inspection of the fan pad/portals area it was observed that the 18 inch PVC pipe which transports undisturbed drainage across the disturbance was separated in two locations. As a result, NOV N95-46-1-1 was issued to the permittee for "failure to maintain diversions". The installation was made many years prior (by the previous owners) and ultraviolet aging of the PVC, plus an in general poor installation, have created the problem.

# b. SEDIMENT PONDS AND IMPOUNDMENTS

It was noted during the records review portion of the inspection that the referral of using the sediment pond 001 for snow storage in the MRP be re-evaluated, and should, more than likely be removed from the verbiage.

#### c. OTHER SEDIMENT CONTROL MEASURES

During his review of the MRP prior to this inspection, Mr. Wright observed a problem with SAE-2, which is the disturbed area west of the main facilities surface shop. Page 7-57 of the MRP, (which was revised 8/31/94), discusses the fact that the permittee used SEDIMOT II to demonstrate the fact that the drainage from this area does not meet effluent limitations, but that the suspended solids from the disturbance were significantly less than the suspended solids from the undisturbed area, i.e. 2,898 mg/l versus 17,320 mg/l. This does not meet R645-301-751, or UPDES effluent parameters. Mr. Wright, Mr. Steve Demczak and I discussed this issue during a closeout in the Price Field Office. The following was determined;

- 1) the area will be changed from an SAE to an ASCA.
- 2) the area will be designed to meet effluent standards as required by the R645 regulations.

The permittee must submit the required information within ten days of receipt of a TDN (which was received by the DOGM on March 16, 1995). It should be noted that Mr. Wright indicated during the closeout meeting that he needed to conduct more research on the issue prior to the possible issuance of a TDN. He had numerous discussions with Mr. Demczak prior to making his decision.

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The second topsoil pile which is down canyon from the mine site employs a silt fence which could stand refurbishing. Also, some straw bales need replacing.

# 5. EXPLOSIVES

The permittee has not conducted any blasting since July, 1992. When blasting is required, the permittee uses an outside certified contractor.

#### 8. NONCOAL WASTE

The site utilizes a ten wheeler roll-up dumpster for storage of noncoal waste; it is placed below the pad where the main mine substation is located. It was noted that the dumpster was very near capacity, and over-heaped in the center. Mr. Gainer was informed that, had the canyon winds been blowing, a potential NOV situation would have existed. The permittee needs to possibly look at either additional storage volume for noncoal waste, (which is unlikely due to the general lack of space in the canyon), or a more frequent removal schedule.

#### 14. SUBSIDENCE CONTROL

The permittee had the annual subsidence survey (aerial) conducted on October 10, 1994. Analysis of the data is currently in progress; this will be submitted in the 1994 Annual report by March 31, 1995.

# 20. AIR QUALITY PERMIT

The permittee currently has an administrative order from the State of Utah, Bureau of Air Quality which is good for 1.5 million TPY. As Genwal is presently gearing up to extract coal with long-wall methods, a submittal to increase their TPY to 2.5-3 million should be submitted to the BAQ in the near future.

Note: This inspection report does not constitute an affidavit of compliance with the regulatory program of the Division of Oil, Gas, and Mining.

Copy of this Report:

Mailed to: Randolph Gainer (Genwal)
Given to: Joe Helfrich (DOGM)

Donna Griffin (OSM)

Filed to: Price Field Office

Date: March 29, 1995

Inspector's Signature:

#39

Peter Hess